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UNITED STATES DISTRICT COURT
FOR DISTRICT OF NORTHERN CALIFORNIA

VLADIMIR BALAREZO, ABELARDO
GUERRERO, VICTOR FUNEZ & OSMIN
AVILA, and on behalf of other similarly
situated

Plaintiffs,

vs.

NTH CONNECT TELECOM INC., AND
STEVEN CHEN,

Defendants

Case No.:C07-05243 JF (PVT)

**FURTHER DECLARATION OF ADAM
WANG IN SUPPORT OF PLAINTIFFS'
MOTION TO COMPEL PRODUCTION OF
DOCUMENTS**

Date: July 1, 2008
Time: 10:00 am
Judge: Patricia V. Trumbull

I, the undersigned, declare as follows:

1. I am an attorney duly authorized to practice before this Court and Plaintiffs' attorney of record in this action. I base this declaration on my personal knowledge unless otherwise indicated.

2. Exhibit 1 hereto is a true and accurate copy of excerpts from Danielle Silva;s deposition in a separate case Aranda v. Nth Connect Telecom Inc., et al. (C06-4738 JW(RS)). In

**FURTHER DECLARATION OF ADAM WANG
IN SUPPORT OF PLAINTIFFS' MOTION
TO COMPEL PRODUCTION OF DOCUMENTS
Balarezo . v. NTH Connect Telecom Inc., et al.**

1 that deposition, Ms. Silva testified that before she became the Operations Finance Manager, she
 2 was the Payroll Supervisor responsible for compiling the Payroll and bi-weekly payout sheets.
 3 She testified that she would create an Excel file for every bi0weekly pay period. Each Excel file
 4 has a separate worksheet or tab entitled "Payroll" containing all the payroll information for all
 5 employees for that pay period; a worksheet entitled "Invoice" representing the Invoice to
 6 Comcast for the first week of the pay period; and "Invoice Number Two" presenting the invoice
 7 to Comcast for the second week of the pay period; and "then each technician has [his] own
 8 sheet." Ms. Silva made it clear at the deposition that the "technician sheet" she referred to is
 9 actually the "B-weekly Pay Out Sheet" requested by Plaintiffs in this case. Documents at issue
 10 in this motion.

11 3. Exhibit 2 hereto is one of the many Comcast Work Orders produced by
 12 Defendants in a separate case Aranda v. Nth Connect Telecom Inc., et al. (C06-4738 JW(RS)).
 13 In that case, Defendants had made literally no efforts in redacting any customer information
 14 contained in the Comcast Worker Orders produced.

15 I declare under the penalty of perjury under the laws of the United States the foregoing is
 16 true and accurate.

17
 18 Dated: June 30, 2008

By: /s/ Adam Wang
 Adam Wang